

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 05-30074-MAP

TAMMY WALKER,)
Plaintiff)
)
v.)
)
CITY OF HOLYOKE,)
Defendant)

JOINT MOTION TO EXTEND DISCOVERY DEADLINE

Now come the plaintiff, Tammy Walker, and the defendant, City of Holyoke, and respectfully request that the court reconsider its order not to allow any further extensions to complete discovery. The plaintiff and the defendant respectfully request that they be allowed an additional 60 days beyond October 27, 2006 in which to complete discovery.

This extension is primarily needed due to the fact that plaintiff's attorney, Ozell Hudson, only appeared in this case on June 12, 2006. Since that time, the parties have engaged in lengthy written discovery. In addition, depositions have been taken of the following witnesses: Captain Alan Fletcher, Sergeant John Monaghan, and Jorge Rodriguez. In addition, the depositions of the plaintiff, Tammy Walker and Police Chief Anthony Scott were taken but have not been completed. Depositions had been scheduled of Lieutenant Fournier, Mayor Michael Sullivan, Lieutenant Eva O'Connell, and Sergeant Joseph Garcia but could not go forward during the month of September as scheduled. Due to the vacation schedules of both counsel in this case and the plaintiff, as well as conflicts in schedules, the remaining depositions cannot be completed before the October 27, 2006 deadline. Accordingly, the plaintiff and the defendant respectfully

request that the court indulge them in one last extension since they have been working diligently to complete discovery in the amount of time available.

WHEREFORE, the plaintiff, Tammy Walker, and the defendant, City of Holyoke, request that the discovery schedule be continued until December 26, 2006.

The Plaintiff,
Tammy Walker,

The Defendant,
City of Holyoke,

By Her Attorney

By Its Attorneys

/s/ Ozell Hudson, Jr.

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I hereby certify that this document, filed through the ECF System, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on October 4, 2006.

/s/ Carole Sakowski Lynch.